

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Public Notice of Inquiry on Rural	)	GN Docket No. 09-29
Broadband Strategy	)	

**Comments of Halo Wireless**

Halo Wireless ("Halo") respectfully submits its Comments in the above-captioned proceeding pursuant to the Public Notice released by the Federal Communications Commission ("FCC" or "Commission") on March 10, 2009 (DA-09-561), regarding the Commission's Report on Rural Broadband Strategy.

**I. Introduction**

Halo is a wireless service provider with plans to provide fixed and nomadic broadband services to underserved commercial and residential areas. Halo is a FCC licensed and CRMS approved carrier to operate within the 3.65 GHz spectrum. Halo is headquartered in Ft. Worth/Dallas, Texas area.

The Commission is seeking comment on how the Commission and the Department of Agriculture ("Agriculture") should implement requirements in § 6112 of the 2008 Farm Bill, time frames for implementation of these recommendations, as well as substantive recommendations to be included in the Commission's required report to Congress.

**II. The Process Should Be Open And Transparent**

The process by which the FCC and Agriculture implement expansion of rural broadband should be open and transparent. Implementation of such processes will ensure that all citizens will be able to track how these monies are utilized.

As part of this transparency, the Commission and Agriculture should establish clear guidelines and goals to ensure broadband is available to all Americans living in rural areas. This will allow the FCC and Agriculture a better opportunity to be able to compare “apples to apples” in any plans that are presented for approval as well as a clear measuring stick to track deployment of broadband.

### **III. Priority Should Be Given To Unserved Communities And Locally-Based Companies**

The Commission seeks substantive recommendations to ensure a rapid build-out of broadband for rural communities. Halo recommends that priority for unserved communities that do not currently have access to broadband.

In order to enable a rapid deployment, Halo recommends that priority be given to those companies that already have a presence in the areas surrounding these unserved communities. Companies that are already in the area near these unserved rural communities will have an intrinsic knowledge of the needs of the unserved community. Further, locally-based companies will have a stronger ability to “hit the ground running” and be able to deploy broadband more rapidly than companies that operate outside of the local area. These local companies will also be in a better position to ensure that service is continually provided to residents in these rural communities.

Further development of broadband strategies in rural areas will allow companies like Halo the ability to expand broadband based services into these communities for the benefits of

those living in these unserved areas. To that end, Halo is developing its plans to offer wireless broadband services in areas in Texas that are currently unserved.

#### **IV. Conclusion**

Halo Wireless appreciates this opportunity to provide comment on Commission's Report on Rural Broadband Strategy and looks forward to participating further in the future.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Katherine Barker Marshall", is written over a horizontal line.

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